

THE HONORABLE RICHARD A. JONES

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

BLACK LIVES MATTER SEATTLE-  
KING COUNTY, ABIE EKENEZAR,  
SHARON SAKAMOTO, MURACO  
KYASHNA-TOCHA, ALEXANDER  
WOLDEAB, NATHALIE GRAHAM,  
AND ALEXANDRA CHEN,

Plaintiffs,

v.

CITY OF SEATTLE,

Defendant.

No. 2:20-cv-00887-RAJ

DECLARATION OF SAM SUEOKA IN  
SUPPORT OF PLAINTIFFS' MOTION  
FOR CONTEMPT

I, Sam Sueoka, declare and state as follows:

1. The information contained in this declaration is true and correct to the best of my knowledge, and I am of majority age and competent to testify about the matters set forth herein.

2. I am a second-year law student at Seattle University School of Law, and I am a Seattle resident living in the Central District.

3. On July 25, 2020, I participated in a march in support of speaking up against police brutality. I joined the march around 2:30 pm. The march started on Broadway and Pine Street, in Capitol Hill. The path of the march took the group in a large loop, starting at Broadway going south, then going north up 12<sup>th</sup> Avenue.

1           4.       Around 4:15 pm, law enforcement began to discharge blast bombs and pepper  
2 spray near 12<sup>th</sup> Avenue and East Pike Street. The blast bombs were being thrown at protesters,  
3 and pepper spray was being discharged from handheld devices. I was with a group of around 50  
4 people. The pepper spray and blast bombs forced us to move east up East Pike Street.

5           5.       I was wearing a 3M half face respirator when the pepper spray was discharged.  
6 The pepper spray caused me to choke and cough profusely. I also needed to rinse my eyes and  
7 face with saline in order to keep the pepper spray from dripping into my eyes.

8           6.       Around 5:00 pm, most of the group made its way to 11<sup>th</sup> Avenue and East Pine  
9 Street. Law enforcement came up quickly behind this group I was with, and with no warnings,  
10 began to discharge blast bombs and pepper spray and pushed the group West towards Broadway.  
11 I saw nothing that could have provoked this response. During this incident I witnessed several  
12 people who needed medical attention. I saw two individuals with open wounds on their shins  
13 who were receiving medical care.

14           7.       Around 6:30 pm, law enforcement, again from behind a group already moving in  
15 this direction, began to push the group further down East Pine Street. During this incident I was  
16 approximately 10 feet away from the front line. Law enforcement pushed the group using their  
17 bikes as a moving barrier. Law enforcement was throwing blast bombs at the crowd and several  
18 detonated in close proximity to where I was. Law enforcement was also discharging pepper  
19 spray and grabbing people's umbrellas out of their hands.

20           8.       The environment during this incident was extremely dangerous and chaotic.  
21 Because law enforcement was pushing the group down a steep hill at a high speed, people began  
22 to panic and run. This caused people to trip over one another and fall. People were yelling and  
23 trying to disperse as quickly as possible.

24           9.       Law enforcement was detonating the blast bombs so frequently my ears began to  
25 ring, and I became disoriented. It is difficult to give an estimate of how many blast bombs were  
26

1 thrown at the group because of the sheer frequency of them going off. I also experienced a severe  
2 headache several hours after I left the protest.

3 10. This experience will serve as the most terrifying moment in my life. I cannot get  
4 the image of sheer panic out of my head. I hope that those who got injured by law enforcement's  
5 use of blast bombs and pepper spray were able to return home safely like I was able to. What  
6 occurred on July 25<sup>th</sup>, 2020, in Capitol Hill was deeply disturbing.

7  
8 Executed this 26<sup>th</sup> day of July 2020 at Seattle, WASHINGTON.

9 I declare under penalty of perjury under the laws of the United States and the State of  
10 Washington that the foregoing is true and correct.

11  
12 By: 

13 SAM SUEOKA  
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